

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

NSC WHOLESALE HOLDINGS LLC., *et al.*,Debtors.¹

Chapter 11

Case No. 18-12394 (CSS)

(Jointly Administered)

NSC LIQUIDATING TRUST,

Plaintiff,

Adv. Proc. No. 20-50899 (CSS)

V.

HADDAD INTERNATIONAL LLC,

Defendant.

PLAINTIFF'S REQUEST FOR JUDGMENT BY DEFAULT

TO: THE CLERK OF THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

The NSC Liquidating Trust (the “Trust” or the “Plaintiff”), by and through its attorneys Gibbons P.C., has requested that a default be entered against Haddad International LLC (the “Defendant”). Upon entry of default, the Plaintiff further requests an entry of default judgment against Defendant pursuant to Fed. R. Civ. P. 55(b)(1), made applicable by Fed. R. Bankr. P. 7055, in the following sum based on the Complaint, Plaintiff’s Request for Entry of Default and the Affidavit of Counsel attached hereto as Exhibit “A”, and incorporated herein by reference.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: NSC Wholesale Holdings LLC (6210); National Wholesale Liquidators of Lodi, Inc. (4301); NSC Realty Holdings LLC (4779); NSC of West Hempstead, LLC (5582); Top Key LLC (7503); BP Liquor LLC (2059); and Teara LLC (8660).

Principal:	\$26,946.27
Costs:	<u>\$350.00</u>
Total:	<u>\$27,296.27</u>

Dated: March 10, 2021
Wilmington, Delaware

GIBBONS P.C.

By: /s/ Howard A. Cohen

Howard A. Cohen (DE 4082)

Natasha M. Songonuga (DE 5391)

300 Delaware Avenue, Suite 1015

Wilmington, DE 19801-1671

Telephone: (302) 518-6324

Facsimile: (302) 429-6294

E-mail: hcohen@gibbonslaw.com

nsongonuga@gibbonslaw.com

-and-

Robert K. Malone, Esq.

One Gateway Center

Newark, New Jersey 07102

Telephone: (973) 596-4500

Facsimile: (973) 596-0545

E-mail: rmalone@gibbonslaw.com

Counsel for the NSC Liquidating Trust